

REMARKS

Claims 1-17 are all the claims pending in the application.

Claims 1-17 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Bentley.

The Applicants traverse the rejections and request reconsideration.

In rejection claim 1, the Examiner is completely mischaracterizing the Bentley system. While the Examiner has cited a reference that shows the use of Java and JavaScript with the ModelServer publisher, the Applicants attach another publication obtained from the Bentley website that describes the Bentley ModelServer product in greater detail.

While claim 1 recites a method of transacting an event, Bentley is at best a system for viewing Engineering documents. An “event,” as used in the present invention, is described in detail on page 14 of the present specification. Specifically, a non-limiting definition for an event is a business event that is created by one resource and is of interest to another resource. Examples of events, as discussed on page 14 include, business events related to billing, orders, shipment, etc. An example data structure for an event is described in relation to Fig. 5A. In addition “transacting an event” is described in detail on page 15.

ModelPublisher does not suggest “events” or “transaction of events” as used in the present invention. ModelPublisher is designed to allow users to electronically send documents and other users to view those documents. The only example of such documents suggested by Bentley are MicroStation DGN files and AutoCad DWG files. By no stretch of imagination can these be considered equivalent to “events” as used in the present invention.

While the present invention deals with transacting “events” between users of the system, Bentley at best suggests letting users send AutoCad drawings and other documents and other users to view these documents using a browser.

Further specific steps that are claimed are not suggested by Bentley. Claim 1 requires a step of determining if an event is registered with the information broker. The Examiner refers to a statement in the Bentley reference that states “ModelServer Continuum serves as in enterprise-wide engineering information broker.” It is believed to be an unreasonable leap to conclude that this is equivalent to registering an event.

Since there are no events or their equivalents suggested by Bentley, there definitely can not be any suggestion for registering an event. Even if, assuming arguendo, the documents (of which there is no suggestion for anything other than DGN and AutoCAD files) are construed to be events, there is no suggestion in Bentley about registering these events. Bentley lets users send their documents so that other users can view them using a browser.

The present invention requires a step of accepting a subscription for an event. For reasons analogous to the ones discussed above in relation to “registering” an event, there is believed to be no suggestions for subscribing to a n event.

Further, the present invention requires a step of creating a platform neutral event. The Applicants reiterate that there is no suggestion for an event. Further, even if the documents in Bentley are construed to be events, no platform event or (platform neutral document) is created in Bentley. The Examiner refers to the use of Java in support for the creation of platform neutral events. The Applicants respectfully submit that Bentley suggests the use of Java only for creating ModelServer Publisher requests. This is believed to be nothing more than interacting

with a system with ModelServer Publisher installed. By no stretch of imagination can this be construed to mean that the ModelServer Publisher or the documents therein are in Java or converted to Java. While the commands to the ModelServer Publisher could be in Java or JavaScript (according to the suggested implementation in the Bentley reference), the ModelServer system itself is not in Java nor are the documents. At best the documents are converted to a graphic format that can be viewed by the web browser. This does not mean that a platform neutral event or a platform neutral document is created by the ModelServer Publisher system. Even if Java and JavaScript are platform neutral, there is no suggestion that the Bentley system creates a platform neutral event.

A skilled artisan would not have been able to practice the invention from the teachings of the Bentley reference or from the ModelServer Publisher system as a whole. Therefore, claim 1, is allowable.

Claims 2-10 are dependent on claim 1 and are allowable at least for the same reasons.

Claim 11 is a system claim with limitations analogous to the ones discussed above in relation to claim 1. Therefore, the arguments presented above supporting the allowability of claim 1 are equally valid.

Claims 12-17 are dependent on claim 11 and are allowable at least for the same reasons.


In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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